ALU/2004



04017740

Washington, D.C. 20549

SSION

30 3/0/04

OMB APPROVAL

OMB Number: 3235-0123

Expires: September 30, 1998 Estimated average burden

hours per response . . . 12.00

ANNUAL AUDITED REPORT FORM X-17A-5 PART III

DEUEWEL &

SEC FILE NUMBER

FACING PAGE APR 0 5 2004

Information Required of Brokers and Dealers Pursuant to Section 175 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING	02/01/2003	AND ENDING	01/31/2004
· ·	MM/DD/YY		MM/DD/YY
A. RE	GISTRANT IDENTI	FICATION	
NAME OF BROKER-DEALER:			
Benefit Securit	ies, Inc.		OFFICIAL USE ONLY
			FIRM ID. NO.
ADDRESS OF PRINCIPAL PLACE OF BU	SINESS: (Do not use P.O). Box No.)	
1407 West 31st	Avenue, Suite 30)1	
	(No. and Street)	·	
Anchorage, Alas	ka 99503		
(City)	(State)		(Zip Code)
NAME AND TELEPHONE NUMBER OF P	DERECAL TO CONTRACT	IN DECARD TO TH	IC DEDORT
		IN REGARD TO TH	907-276-2000
Christopher Cad	lieux		
•			(Area Code — Telephone No.)
B. AC	COUNTANT IDENT	IFICATION	
INDEPENDENT PUBLIC ACCOUNTANT	whose opinion is contained	i in this Report*	
	ck_&_Associates,		
,	me — if individual, state last, first, n		
1407 West 31st	Avenue, Suite 5	00 Anchorage	, Alaska 99503
(Address)	(City)	(State)	Zip Code)
CHECK ONE: Z Certified Public Accountant			PROCESSED
Public AccountantAccountant not resident in United	States or any of its posse	essions.	APR 07 2004
	FOR OFFICIAL USE ONL	LY	FINANCIAL:
		·	

^{*}Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances reflect on as the basis for the exemption. See section 240.17a-5(e)(2).

TO BE COMPLETED WITH THE ANNUAL AUDIT REPORT ONLY:

INDEPENDEN	NT PUB	LIC ACCOUNTANT	whose opinion is c	ontained in this Repor	t		
Name (I	f indivi	dual, state last, first,	middle name)			,	•
Rulie	en, V	Whitlock & A	ssociates,	LLC			
	-			,	70		
ADDRESS	Nur	nber and Street	City	:	State		Zip Code
1407	West	31st Avenu	e, Suite 50	00 Anchorage,	Alaska	99503	
			71	72	73	·	7.4
Check One							
	(X)	Certified Public	Accountant	75]	FOR SE	C USE
	()	Public Account	ant	76] . [
	()	Accountant no any of its posse	t resident in United ssions	States or 77]		
				•		•	*
							•
	=	DO NOT	WRITE UNDER THIS	LINE FOR SEC USE	ONLY		
	:	WORK LOCATION	REPORT DATE	DOC. SEQ. NO.	CARD		T
· .							

FORM X-17A-5

FOCUS REP_RT

DMB No. 3235-0123 (5-31-87)

(Financial and Operational Combined Uniform Single Report)

PART IIA 12

3/91	(Please read instructions before preparing Form.)	
1) Rule 17a-5(a)	ant to (Check Applicable Block(s)): X 16 2) Rule 17a-5(b) 17 3) Rule 17a-11 request by designated examining authority. 19 5) Other 26	<u> </u>
4) Special		
IAME OF BROKER-DEALER	SEC FILE NO. 8-29560 FIRM ID. NO.	14
Benefit :	Securities, Inc. 13 013632	
DDRESS OF PRINCIPAL PLACE (F BUSINESS (Do Not Use P.O. Box No.) FOR PERIOD BEGINNING	/MM/CD/YY
1407 Wes	31st Avenue, Suite 301 20 02/01/2003	24
· · · · · · · · · · · · · · · · · · ·	(No. and Street) AND ENDING (MM/DD/YY	
Anchorage		25
(City)	(State) (Zip Code)	
AME AND TELEPHONE NUMBE	OF PERSON 10 CONTACT IN REGARD TO THIS REPORT (Area Code)—Telephone I	No.
	dieux, President 30 907-276-2000	31
AME(S) OF SUBSIDIARIES OR	AFFILIATES CONSOLIDATED IN THIS REPORT: OFFICIAL US	E 33
	34	35
\	36	37
	38	39
ALRBS 24000 COS	EXECUTION:	
013632-J EFIT SECURI ERT J. CADI 7 WEST 31ST	The registrant/broker or dealer submitting this Form and its attachments and the by whom it is executed represent hereby that all information contained thereis correct and complete. It is understood that all required items, statements, and are considered integral parts of this Form and that the submission of any and represents that all unamended items, statements and schedules remain true, complete as previously submitted.	in is true, I schedules nendment
EH AGI		
VXE E SI	Dated the day of 19	
NU	Manual signatures of:	
AE N C	1)	
ns.	Principal Executive Officer or Managing Partner	
TI TI	2)	•
SE S	Principal Financial Officer or Partner	
ωω	3)	•
• (Principal Cyerations Officer or Partner	
<u> </u>	ATTENTION—Intentional misstatements or omissions of facts constitute Federal Criminal Violations. (See 18 U.S.C. 1001 and 15 U.S.C. 78:f(a))	

		P	ART IIA					
₿F	ROKER OR DEALER Benefit Secur:	ities, Inc	· .		N 3			100
	STATEMENT OF FINANCE	CIAL CONDITION RTAIN OTHER	BROKERS OR	DEALERS				
		•		of (NAM/DD/Y	Y) 01/31/	2004		99
	·			SEC.	ELENO 8-2	29560		98
		1	ASSETS	320	, ree 110	Consolidated		198
		•	100610	à	•	Unconsolidated		199
	•	Allowabl	e	Non-Al	lowable		otal	
1.	Čash	11,882	200			\$11,882		750
2.	Receivables from brokers or dealers:			* *				
	A. Clearance account		295			./_ 11		
		11,335	300 \$ 2		550	13,773	<u></u>	810
	Receivables from non-customers	· · · · · · · · · · · · · · · · · · ·	355	3,000	600	.3 <u>.1000i</u>		830
4.	Securities and spot commodities							
	owned, at market value:		<u> </u>					
	A. Exempted securities		418					
	B. Debt securities		419					
	C. Options		420					
	D. Other securities		424				1	
	E. Spot commodities		430					B50
5.	Securities and/or other investments				•			
	not readily marketable:							
	A. At cost 7 \$ 130					1		
	B. At estimated fair value		440		610			860
6.	Securities borrowed under subordination agree-							
	ments and partners' individual and capital		,				,	
	securities accounts, at market value:		460		630	<u> </u>		880
	A. Exempted							
	securities \$ 150						,	,
	B. Other							
	securities \$ 160	•				1 .		
7.	Secured demand notes:		470		640			890
	market value of collateral:	•						
	A. Exempted							
	securities \$ 170		, .					
	B. Other				•			
	securities \$ 180							
8.	Memberships in exchanges:							
	A. Owned, at	•						
	market \$							-
	B. Owned, at cost				650	•	,	
	C. Contributed for use of the company,		·			1 3	(
	at market value				660			900
9.	Investment in and receivables from .							
	affiliates, subsidiaries and					; .	·	0.5
	associated partnerships		480		670		il	910
10.	Property, furniture, equipment,		•					
	leasehold improvements and rights							,
	under lease agreements, at cost-net							
	of accumulated depreciation	•						
	and amortization		490 .	1,895	680	<u>1,895</u>		920
1.	· · · · · · · · · · · · · · · · · · ·	70,643		2,418	735	203,061		930
2.	TOTAL ASSETS	984.860	540 \$ 3	9.751	740	233,611		940

OMIT PENNIES

BROKER OR DEALER

Benefit Securities, Inc.

as of 01/31/2004

STATEMENT OF FINANCIAL CONDITION FOR NONCARRYING, NONCLEARING AND CERTAIN OTHER BROKERS OR DEALERS

LIABILITIES AND OWNERSHIP EQUITY

	Liabilities	A.I. Liabilities	Non-A.I. Liabilities	Total
	Bank loans payable	\$1	045 \$ 1255	\$ 1470
14.	Payable to brokers or dealers:			
	A. Clearance account		114 1315	1560
	B. Other		115 1305	11,335
	Payable to non-customers		155 170,643 1355	170,643
10.	at market value		1360	1620
17.	Accounts payable, accrued liabilities.		1,500	1.020
	expenses and other	7,675	205	7,675
18.	Notes and mortgages payable:			
	A. Unsecured	1:	210	1690
	B. Secured	1.	211 🔻 1390	1700
19.	Liabilities subordinated to claims			
	of general creditors:			
	A. Cash borrowings:	·····	1400	
	1. from outsiders § \$	970		
	2. Includes equity subordination (15c3-1 (d))	000		
	of \$	980		
	B. Securities borrowings, at market value:		1410	1720
	from outsiders \$	990		
	C. Pursuant to secured demand note			
	collateral agreements:		1420	1730
	1. from outsider: \$	1000		
	2Includes equity subordination (15c3-1 (d))			
	of \$1	010		
	D. Exchange memberships contributed for			
	use of company, at market value	•	1430	1740
	E. Accounts and other borrowings not	-		1 (
	qualified for net capital purposes		220 1440	1750
20.	TOTAL LIABILITIES	\$ 19,010	230 \$170,643 1450	\$189,653
	Ownership Equity			·
	Ownership Equity			
21.	Sole proprietorship			[\$ 1770]
	Partnership (limited partners	\$ 11	020)	1780
	Corporation:			
	A. Preferred stock			
	B. Common stock			10,000
	C. Additional paid-in capital			14.500 1793
	D. Retained earnings			·
	E. Total			
	F. Less capital stock in treasury			
24.	TOTAL OWNERSHIP EQUITY			
25.	TOTAL LIABILITIES AND OWNERSHIP	EQUITY		
			r	OMIT PENNIES

	2/01/200	3 3932 100 1 / 3 1	/ 0 4 3933
Number of months included in this si			3931
STATEMENT OF INCOME (LOSS)		•	
REVENUE			
1. Commissions:			
a. Commissions on transactions in exchange listed equity securities executed on an exchange	\$	_	3935
b. Commissions on listed option transactions	· · · · · · · · · · · · · · · · · · ·		3938
c. All other securities commissions			3939
d. Total securities commissions	· <u> </u>		3940
2. Gains or losses on firm securities trading accounts			
a. From market making in options on a national securities exchange			3945
b. From all other trading		·	3949
c. Total gain (loss)		<u> </u>	3950
3. Gains or losses on firm securities investment accounts	-		3952
4. Profit (loss) from underwriting and selling groups			3955
5. Revenue from sale of investment company shares		·	3970
6. Commodities revenue			3990
7. Fees for account supervision, investment advisory and administrative services			3975
8. Other revenue		49,659	3995
5. TOTAL TEVERIUE	••••••••••••••••••••••••••••••••••••••	58,533	4030
O. Salaries and other employment costs for general partners and voting stockholder officers		•	
9 Dibaa amalawaa aanaan milaa and baasiisa			4120
Other employee compensation and benefits	,	34,423	4115
2. Commissions paid to other broker-dealers	····· <u>\$</u>	34,423	4115 4140
2. Commissions paid to other broker-dealers	· · · · · · · · · · · · · · · · · · ·	34,423	4115 4140
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes Interest on accounts subject to subordination agreements	4070	34,423	4115 4140 4075
2. Commissions paid to other broker-dealers 3. Interest expense 4. Regulatory fees and expenses 4. Regulatory fees and expenses	4070	34,423 <36,659>	4115 4140 4075 4195
2. Commissions paid to other broker-dealers 3. Interest expense 4. Regulatory fees and expenses 5. Other expenses	4070	34,423	4115 4140 4075 4195 4100
2. Commissions paid to other broker-dealers 3. Interest expense 4. Regulatory fees and expenses 4. Regulatory fees and expenses	4070	34,423 <36,659>	4115 4140 4075 4195 4100
2. Commissions paid to other broker-dealers 3. Interest expense 4. Regulatory fees and expenses 5. Other expenses	4070	34,423 <36,659>	4115 4140 4075 4195 4100
2. Commissions paid to other broker-dealers 3. interest expense a. Includes Interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses	4070	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes Interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 6. Total expenses 6. Total expenses 7. Net Income (loss) before Federal income taxes and items below (item 9 less item 16)	4070	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 6. Total expenses 7. Net Income (loss) before Federal income taxes and items below (item 9 less item 16). 6. Provision for Federal income taxes (for parent only)	4070 \$	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net Income (loss) before Federal income taxes and items below (item 9 less item 16) 7. Provision for Federal income taxes (for parent only) 7. Equity in earnings (losses) of unconsolidated subsidiaries not included above	\$ \$ \\ \frac{\frac{1}{3}}{\frac{1}{3}}	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net income (loss) before Federal income taxes and items below (item 9 less item 16) 7. Provision for Federal income taxes (for parent only) 7. Equity in earnings (losses) of unconsolidated subsidiaries not included above 8. After Federal income taxes of	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200 4210 4220 4222
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes Interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net Income (loss) before Federal Income taxes and Items below (Item 9 less Item 16) 7. Provision for Federal Income taxes (for parent only) 7. Equity in earnings (losses) of unconsolidated subsidiaries not included above a. After Federal Income taxes of	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200 4210 4220 4222
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net income (loss) before Federal income taxes and items below (item 9 less item 16) 7. Provision for Federal income taxes (for parent only) 7. Equity in earnings (losses) of unconsolidated subsidiaries not included above 8. After Federal income taxes of	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200 4210 4220 4222
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes Interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net Income (loss) before Federal Income taxes and Items below (Item 9 less Item 16) 7. Provision for Federal Income taxes (for parent only) 7. Equity in earnings (losses) of unconsolidated subsidiaries not included above a. After Federal Income taxes of 6. Extraordinary gains (losses) a. After Federal income taxes of	\$ \$ \\ \frac{\frac{1}{3}}{3}} \\ \frac{1}{3}}	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200 4220 4224 4224
2. Commissions paid to other broker-dealers 3. interest expense a. Includes Interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net income (loss) before Federal income taxes and items below (item 9 less item 16). 8. Provision for Federal income taxes (for parent only). 9. Equity in earnings (losses) of unconsolidated subsidiaries not included above a. After Federal income taxes of 9. Extraordinary gains (losses) a. After Federal income taxes of 1. Cumulative effect of changes in accounting principles	\$ \$ \\ \frac{\frac{1}{3}}{3}} \\ \frac{1}{3}}	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200
2. Commissions paid to other broker-dealers 3. Interest expense a. Includes interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net Income (loss) before Federal Income taxes and Items below (Item 9 less Item 16) 7. Provision for Federal Income taxes (for parent only) 7. Equity in earnings (losses) of unconsolidated subsidiaries not included above 8. After Federal Income taxes of 9. Extraordinary gains (losses) 9. Extraordinary gains (losses) 9. Cumulative effect of changes in accounting principles 9. Net income (loss) after Federal income taxes and extraordinary Items	\$ \$ \\ \frac{\frac{1}{3}}{3}} \\ \frac{1}{3}}	34,423 <36,659> <49,522> 80,995	4115 4140 4075 4195 4100 4200 4220 4224 4224
2. Commissions paid to other broker-dealers 3. interest expense a. Includes Interest on accounts subject to subordination agreements 4. Regulatory fees and expenses 5. Other expenses 6. Total expenses 7. Net income (loss) before Federal income taxes and items below (item 9 less item 16). 8. Provision for Federal income taxes (for parent only). 9. Equity in earnings (losses) of unconsolidated subsidiaries not included above a. After Federal income taxes of 9. Extraordinary gains (losses) a. After Federal income taxes of 1. Cumulative effect of changes in accounting principles	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	34,423 <36,659> <49,522> 80,995 <22,462>	4115 4140 4075 4195 4100 4200 4220 4224 4224

BROKER OR DEALER	Benefit Securities, Inc.	as of <u>01/31/2004</u>
	Exemptive Provision Under Rule 15c	3-3
5. If an exemption from Rule	15c3-3 is claimed, identify below the section upon	• •
which such exemption	is based (check one only)	
A. (k) (1)—\$2,500 capita	category as per Rule 15c3-1	4550
B. (k) (2)(A)—"Special A	Account for the Exclusive Benefit of	
customers" maint	ained	X 4560
C. (k) (2)(B)—All custom	er transactions cleared through another	
broker-dealer on	a fully disclosed basis. Name of clearing	•
firm $\frac{\Psi}{21}$		4335 4570
D. (k) (3)—Exempted by	order of the Commission	4580

BROKER OR DEALER

Benefit Securities, Inc.

as of 01/31/2004

COMPUTATION OF NET CAPITAL

			•	
1.	Total ownership equity from Statement of Financial Condition		s 43,958	3480
2.	Deduct ownership equity not allowable for Net Capital) 3490
3.	Total ownership equity qualified for Net Capital			3500
4.				
	A. Liabilities subordinated to claims of general creditors allowable in computation of net capital			3520
	B. Other (deductions) or allowable credits (List)	<i>.</i>		3525
5.	Total capital and allowable subordinated liabilities	. <i></i>	\$ 43 958	3530
6.	Deductions and/or charges: ▼			
	A. Total nonallowable assets from Statement of Financial Condition (Notes B and C) \$395.751.	3540		
	B. Secured demand note deficiency	3590		
	C. Commodity futures contracts and spot commodities-		•	•
	proprietary capital charges	3600		
	D. Other deductions and/or charges	3610	(39,751) 3620
7.	Other additions and/or allowable credits (List)			3630
8.	Net capital before haircuts on securities positions	20	\$ 4,207	3640
9.	Haircuts on securities (computed, where applicable,			
	pursuant to 15c3-1 (f)):	i. ,		
	A. Contractual securities commitments	3660		
	B. Subordinated securities borrowings	3670		
	C. Trading and investment securities:			
	1. Exempted securities	3735	,	
	2. Debt securities	3733		
	3. Options	3730		
	4. Other securities	3734		
	D. Undue Concentration	3650		
•	E. Other (List)	3736	(1 3740
10.	Net Capital		s 4,207	3750

BROKER OR DEALER	Renefit	Securities.	Inc.
DITOREIT OIL DEALETT	Deneric	pecurities,	T110 *

as of 01/31/2004

COMPUTATION OF BASIC NET CAPITAL REQUIREMENT

Part A

11.	Minimum net capital required (6-2/3% of line 19)	1	,267	· ·	3756
12.			0.00		
	of subsidiaries computed in accordance with Note (A)	55	,000	·	3758
13.	Net capital/requirement (greater of line 11 or 12)				3760
14.	Excess net capital (line 10 less 13)	\$	₹793>		3770
15.	Excess net capital at 1000% (line 10 less 10% of line 19)	<u>2</u>	.306		3780

COMPUTATION OF AGGREGATE INDEBTEDNESS

16.	Total A.I. liabilities from Statement of Financial Condition		\$_1	9.01 ¹ 0	: :	3790
17.	Add:			, , , , , , , , , , , , , , , , , , ,		
	A. Drafts for immediate credit	3800		•		
	B. Market value of securities borrowed for which no equivalent					
	value is paid or credited	3810				
	C. Other unrecorded amounts (List)	3820	\$	<u> </u>	111	3830
19.	Total aggregate indebtedness		s <u>. 1</u>	9,010		3840
20.	Percentage of aggregate indebtedness to net capital (line 19 ÷ by line 10)				1.	3850
21.	Percentage of debt to debt-equity total computed in accordance with Rule 15c3-1 (d)		%	<u> </u>	! !	3860

COMPUTATION OF ALTERNATE NET CAPITAL REQUIREMENT

Part B

22. 2% of combined aggregate debit items as shown in Formula for Reserve Requirements pursuant to Rule

15c3-3 prepared as of the date of the net capital computation including both brokers or dealers
and consolidated subsidiaries' debits.

23. Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital
requirement of subsidiaries computed in accordance with Note (A)

24. Net capital requirement (greater of line 22 or 23)

25. Excess net capital (line 10 less 24)

26. Net capital in excess of:

5% of combined aggregate debit items or \$120,000

\$ 3920

OMIT PENNIES

NOTES:

- (A) The minimum net capital requirement should be computed by adding the minimum dollar net capital requirement of the reporting broker dealer and, for each subsidiary to be consolidated, the greater of:
 - 1. Minimum dollar net capital requirement, or
 - 2. 6-2/3% of aggregate indebtedness or 2% of aggregate debits if alternative method is used.
- (B) Do not deduct the value of securities borrowed under subordination agreements or secured demand note covered by subordination agreements not in satisfactory form and the market values of memberships in exchanges contributed for use of company (contrato item 1740) and partners' securities which were included in non-allowable assets.
- (C) For reports filed pursuant to paragraph (d) of Rule 17a-5, respondent should provide a list of material non-allowable assets.

Ownership Equity and Subordinated Liabilities maturing or proposed to be withdrawn within the next six months and accruals, (as defined below), which have not been deducted in the computation of Net Capital.

					•	•
wi Se	e of Proposed thdrawal or Accrual se below for ode to enter	Name of Lender or Contributor	Insider or Guisider? (in or Out)	Amount to be With- drawn (cash amount and/or Net Capitat Value of Securities)	(MMDDYY) Withdrawal or Maturity Date	Expect to Renew (yes or na)
¥ 22	4600	4601	. 4602	4603	4604	4605
<u>¥</u> ,	4610	4611	4612	4613	4614	4615
¥ 34	4620	4621	4622	4623	4624	4625
<u>,,,</u>	4630	4631	4632	4633	4634	4635
¥ 24	4640	4641	4642	4643	4644	4645
¥ 27	4650	4651	4652	4653	4654	4655
¥ 20	4660	4661	4662	4663	4664	4665
Y	4670	4671	4672	4673	4674	4675
<u>*</u>	4680	4681	4682	4683	4684	4685
<u>*</u>	4690	4691	4692	4693	4694	4695
			TOTAL \$	4699		

OMIT PENNIES

Instructions: Detail listing must include the total of items maturing during the six month period following the report date, regardless of whether or not the capital contribution is expected to be renewed. The schedule must also include proposed capital withdrawals scheduled within the six month period following the report date including the proposed redemption of stock and payments of liabilities secured by fixed assets (which are considered allowable assets in the capital computation pursuant to Rule 15c3-1(c)(2)(iv)), which could be required by the lender on demand or in less than six months.

WITHDRAWAL CODE:

DESCRIPTION

1. Equity Capital

2. Subordinated Liabilities

3. Accruals

4. 15c3-1(c)(2)(iv) Liabilities

3/78

BR	OKER OR DEALER	Benefit Se	ecurities,	Inc.					:
			For the	e period (MMD	DYY) from 0.2./0:	1/200	3	1001/	31/2004
			NT OF CHANGE ETORSHIP, PAR			N)			
1.	Balance, beginning of period						s 55,	703	4240
- •	A. Net income (loss)						<22,	462>	4250
	B. Additions (Includes non-confe					4262			4260
	C. Deductions (Includes non-con					4272			4270
2.	Balance, end of period (From item	n 1800)					\$ <u>4</u> 3,	958 =	4290
			OF CHANGES IN			D			
		10	CLAIMS OF GEN	NEHAL CHEL	DITORS				
3.	Balance, beginning of period						\$		4300
•	A. Increases								4310
	B. Decreases	,							4320

4. Balance, end of period (From item 3520).....



R U L I E N, WHITLOCK

& Associates, LLC

1407 W. 31st Avenue,

Suite 500%

Anchorage, AK 99503

Tel. (907) 272-1421

Fax. (907) 272-8556

www.rulienwhitlock.com

March 27, 2004

Board of Directors
Benefits Securities, Inc.

Gentlemen:

Below is the computation of net capital of Benefit Securities, Inc., at January 31, 2004, pursuant to Rule 15c3-1:

	1. Total ownership equity from Statement of Financial Condition \$	43,958
	2. Deduct ownership equity not allowable for Net Capital	40.050
	3. Total ownership equity qualified for Net Capital	43,958
	4. Add:	1
`	A. Liabilities subordinated to claims of general creditors allowable in	,
	computation of net capital.	-
	B. Other deductions or allowable subordinate liabilities	
	5. Total capital and allowable subordinate liabilities	43,958
	6. Deductions and/or charge:	
	A. Total non-allowable assets from Statement of Financial Condition	39,751
	B. Secured demand note deficiency	
	C. Commodity futures contracts and spot commodities	·
٠.	D. Other deductions and/or charges (income taxes)	
	7. Other additions and/or allowable credits (list)	. ´ -
	8. Net capital before haircuts on securities positions	4,207
	9. Haircuts on securities (computed, where applicable,	
	pursuant to 15c3-1 (f):	
	A. Contractual securities commitments	, -
	B. Subordinated securities borrowings	-
	C. Trading and investment securities:	
	1. Executed securities	· · · · · · · · · ·
	2. Debt securities	7,
	3. Options	·, -
	4. Other securities	, ,-
•	D. Undue concentration	
	E. Other	
	10. Net Capital	4,207
		-



 $\frac{R U L I E N}{WHITLOCK}$

& Associates, LLC

1407 W. 31st Avenue,

Suite 500

Anchorage, AK 99503

Tel. (907) 272-1421

Fax. (907) 272-8556

www.rulienwhitlock.com

March 27,2004

Board of Directors
Benefits Securities, Inc.

Gentlemen:

Below is a computation of the basic net capital requirement of Benefit Securities, Inc., at January 31, 2004, pursuant to Rule 15c3-1:

Minimum net capital (6 2/3% of total aggre	egate indebtedness) <u>\$ 1,26</u>	7
National Additional Ad	V	,
Minimum dollar net capital requirement of dealer and minimum net capital require	•	<u>0</u>
Net capital requirement (greater of above)	\$ 5,00	<u>Q</u>
Excess <deficit> net capital</deficit>	\$ <79	<u>3</u> >
Excess net capital at 1000% (net capital less aggregate indebtedness)	\$\$ 10% of total \$_2,30	<u>6</u>

We find that you are not operating in accordance with Rule 15c3-1 and the \$5,000 minimum net capital requirement.

elie, Whittock i associates, in

Sincerely,

Rylien, Whitlock & Associates, LLC

Bénefit Securities, Inc. March 27, 2004 Page 2

During our audit of Benefit Securities, Inc., we found no material inadequacies in your system of internal control as covered by Rule 17a-5(g) of the Securities Exchange. Commission.

Material differences between our computation of net capital pursuant to Rule 15c3-1 and that contained in the focus report filed by the client for the year ended January 31, 2004 are explained in the attached reconciliation. Benefit Securities, Inc. is exempt from the reserve requirements of Rule 15c3-3 due to paragraph (k)(2)(a). They are also exempt under paragraph (k)(2)(a) of Rule 15c3-3 for possession and control.

Benefit Securities, Inc. does not use another broker-dealer for customer transactions, receive or hold securities or funds for customers, and does not carry accounts for customers.

Sullew, Whithrow i associates, LLC

Rylien, Whitlock & Associates, LLC

Cc: National Association of Securities Dealers, Inc.

Securities Exchange Commission

Securities and Exchange Commission Regional Administrator



RULIEN, WHITLOCK

& Associates, LLC

1407 W. 31st Avenue,

Suite 500

Anchorage, AK 99503

Tel. (907) 272-1421

Fax. (907) 272-8556

www.rulienwhitlock.com

March 27,2004

Board of Directors Benefit Securities, Inc.

Gentlemen:

We have reviewed your \$150 assessment notices from the Securities Investor Protection Corporation (SIPC) and cleared checks for the payments of the assessments on January 15, 2003 and March 3, 2004 for the respective years and find that you are in accordance with the SIPC and their membership requirements.

Sincerely,

Sullew, Whothsh & amountes, cic Rullen, Whitlock & Associates, LLC

OATH OR AFFIRMATION

Ĭ	Christopher R. Cadieux	, swear (or affirm) that, to the
best of	my knowledge and belief the accompanying financial statement	ent and supporting schedules pertaining to the firm of
	Benefit Securities, Inc.	, as of
nor any	January 31, , 2004 are true and correct. partner, proprietor, principal officer or director has any proprietor, except as follows:	
_	•	
	•	Signature
0	2	President
Y	My Commission expires Hy Commission expires	OFFICIAL SEAL STATE OF ALASKA SANDRA L. LARSON NOTARY PUBLIC
(a) (b) (c)	Facing page. Statement of Financial Condition. Statement of Income (Loss).	
□ (e)	Statement of Changes in Financial Condition. Statement of Changes in Stockholders' Equity or Partners' of Statement of Changes in Liabilities Subordinated to Claims of Computation of Net Capital	
(i) (j)	Computation for Determination of Reserve Requirements Pur Information Relating to the Possession or control Requirement A Reconciliation, including appropriate explanation, of the C Computation for Determination of the Reserve Requirements	nts Under Rule 15c3-3. omputation of Net Capital Under Rule 15c3-1 and the Under Exhibit A of Rule 15c3-3.
	A Reconciliation between the audited and unaudited Statements solidation.	of Financial Condition with respect to methods of con-
(m)	An Oath or Affirmation. A copy of the SIPC Supplemental Report. A report describing any material inadequacies found to exist or form	ound to have existed since the date of the previous audit.

**For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).